

APPENDIX G—ARAC WORKING GROUP REPORT

The working group should document its decisions and discuss areas of disagreement, including any options, using this report. The report is expected to —

- Provide information necessary to develop individual rulemaking project records for the Federal Aviation Administration (FAA) rulemaking team’s use.
- Serve as the basis for developing the subsequent proposed rule.

AVIATION RULEMAKING ADVISORY COMMITTEE WORKING GROUP REPORT

1a. What is the underlying safety issue addressed by 14 CFR? *[Explain the underlying safety rationale for the requirement. Why does the requirement exist?]*

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1b. What is the underlying safety issue addressed by the JAR? *[Explain the underlying safety rationale for the requirement. Why does the requirement exist?]*

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2a. What are the current 14 CFR standards? *[Insert the 14 CFR regulatory text.]*

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2b. What are the current JAR standards, if applicable? *[Insert the 14 CFR and JAR regulatory text.]*

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**AVIATION RULEMAKING ADVISORY COMMITTEE
WORKING GROUP REPORT (CONTINUED)**

3. What are the differences between standards and what do these differences result in?

[Explain the differences between the 14 CFR standards and the JAR standards, and what these differences result in relative to (as applicable) design features/capability, safety margins, cost, and stringency.]

4. What, if any, are the differences in the means of compliance? *[Provide a brief explanation of any differences in the compliance criteria or methodology, including any differences in either criteria, methodology, or application that result in a difference in stringency between the 14 CFR standards and the JAR standards.]*

5. What is the proposed action? *[Explain what action is being proposed (not the regulatory text, but the underlying rationale) and why that direction was chosen]. For harmonization tasks, is the proposed action to harmonize one of the two standards, mix two standards, propose a new standard, or take some other action?]*

6a. What should the standard be? *[Insert the proposed text of the standard here.]*

6b. What should the harmonized standard be, if applicable? *[Insert the proposed text of the harmonized standard here.]*

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7. How does this proposed standard address the underlying safety issue identified in question No. 1? *[Explain how the proposed standard ensures the underlying safety issue is addressed.]*

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8. Relative to current 14 CFR standards, how does the proposed standard affect the level of safety?

(Circle one.) [Explain how each element of the proposed change to the standard affects the level of safety relative to the current 14 CFR. It is possible that some portions of the proposal may reduce the level of safety even though the proposal as a whole may increase the level of safety?]

increase

decrease

maintain

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9. Relative to current industry practice, how does the proposed standard affect the level of safety? *(Circle one.)*

[Because industry practice may be different than what is required by 14 CFR (for example, general industry practice may be more restrictive), explain how each element of the proposed change to the standard affects the level of safety relative to current industry practice. Explain whether current industry practice is in compliance with the proposed standard.]

increase

decrease

maintain

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10. What other options have been considered? *[Explain what other options were considered and why they were not selected (for example, cost/benefit, unacceptable decrease in the level of safety, and lack of consensus).]*

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11. Who would be affected by the proposed change? *[Identify the parties that would be significantly affected by the rule change, such as airplane manufacturers and airplane operators.]*

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AVIATION RULEMAKING ADVISORY COMMITTEE WORKING GROUP REPORT (CONTINUED)

12a. To ensure harmonization, what current advisory material (for example, advisory circular joint, advisory material joint, advisory circular, policy letters) needs to be included in the preamble or in the rule language? *[Does the existing advisory material include substantive requirements that should be contained in the regulation? This may occur because the regulation itself is vague, or if the advisory material is interpreted as providing the only acceptable means of compliance.]*

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12b. Is current FAA advisory material (for example, advisory circular, policy letters) adequate? <i>(Circle one.)</i>	Yes	No
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12c. If not, what advisory material should be adopted? *[Indicate whether the existing material should be revised or new material provided. Also, either insert the text of the proposed advisory material here, or summarize the information it will contain and indicate what form it will be in (for example, advisory circular, policy, or order).]*

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13. How does the proposed standard affect the current ICAO standard? *[Indicate whether the proposed standard complies with or does not comply with the applicable ICAO standards, if any.]*

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14. How does the proposed standard affect other working groups? *[Indicate whether other working groups should review the proposed standard and why.]*

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15a. Is compliance with the proposed standard the current industry practice in all cases? <i>(Circle one.)</i>	Yes	No
15b. If not, what is the cost impact of complying with the proposed standard? <i>[Is the overall cost impact likely to be significant, and will the costs be higher or lower? Explain what items affect the cost of complying with the proposed standard relative to the cost of complying with the current standard.]</i>		
15c. What are cost savings from compliance with the proposed standard instead of the existing standards? <i>[For harmonization tasks, include any cost savings that would result from complying with one harmonized regulation instead of the two existing standards.]</i>		
16. Does the harmonization working group want to review the draft NPRM (if applicable) before publication in the Federal Register? <i>(Circle one.)</i>	Yes	No
17. In light of information provided in this report, does a harmonization working group consider that the fast track process is appropriate for this rulemaking project or is the project too complex or controversial for the fast track process? <i>[A negative answer to this question will prompt the FAA to remove the project from the fast track process and forward the issues to the Rulemaking Management Council for consideration as a “significant” project.]</i>		